



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

MAR 29 1999

Mr. Y. Goto
Sakai Trading New York Inc.
317 Madison Avenue, #1601
New York, NY 10017

Ref. No. 99-0026

Dear Mr. Goto:

This is in response to your letter dated January 26, 1999, concerning the display of bilingual text on hazard warning labels under the Hazardous Materials Regulation (HMR; 49 CFR Parts 171-180). Specifically, you ask whether it is permissible to use another language, in addition to English, for the text on labels.

The answer is yes. Labels conforming to provisions in the United Nations Recommendations may be used in place of the corresponding labels under the HMR. Paragraph 5.2.2.2.1.6 of the United Nations Recommendations (10th Revised Edition), in limiting text placed on labels to "particulars indicating the nature of the risk and precautions in handling," implies that bilingual inscriptions or text indicating the nature of the risk are acceptable. However, we interpret this provision as being limited to those inscriptions authorized by a competent authority. On this basis, if the Japanese government requires such an inscription, it would be allowed.

I hope this satisfies your request.

Sincerely,



John A. Gale
Transportation Regulations Specialist
Office of Hazardous Materials Standards

172.407

SAKAI TRADING NEW YORK INC.

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January 26, 1999

BAH

172.407

U.S. Department of Transportation
Attn: Mr. Edward Mazzullo
RSPA
Hazardous Material Standard
400, 7th Street S.W.
Washington, D.C. 20590

Subject: Bilingual Hazardous Label for imported Chemical
ABN-R (2,2 Azobisisobutyronitrile)

Gentlemen:

The subject chemical imported under DOT's permission with hazardous warning label shown on each drum and outer container for in transit as Flammable Solid Class 4. The label is shown in bilingual basis (both English and Japanese, see attached) due to the hazardous control in Japan also required such label.

In doing so, we therefore, anxiously ask your favor to interpret in accordance with DOT regulation, to determine whether the above mentioned bilingual label is permissible by Federal regulation? The said label has violated any of DOT regulation? If not, Federal regulation prevail or not in conflict with state or local citation which disapprove the bilingual label?

Kindly reply by sending your valuable interpretation to us by fax (212) 599-1536, to allow us to solve the above mentioned problem.

Thank you very much.

Respectfully Submitted,

Sakai Trading New York Inc.


Y. Goto / Sales Manager